

# EXHIBIT B

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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CHAD PELISHEK,

Plaintiff,

CONFIDENTIAL

-vs-

Case No. 2:23-CV-1048

CITY OF SHEBOYGAN, et al.,

Defendants.

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Examination of CHAD PELISHEK, taken at  
the instance of the Defendants, under and pursuant to  
the applicable Rules of Civil Procedure, before  
SAMANTHA J. SHALLUE, a Registered Professional  
Reporter and Notary Public in and for the State of  
Wisconsin, at MWH Law Group, 735 North Water Street,  
Suite 610, Milwaukee, Wisconsin, on July 31, 2024,  
commencing at 10:10 a.m. and concluding at 4:49 p.m.

HUDSON COURT REPORTING & VIDEO

(800) 310-1769

1 Q Did you use your personal e-mail account to  
2 communicate with anyone besides your attorney  
3 regarding your claims in the amended complaint?

4 MS. DeMASTER: Objection as to form  
5 of the question.

6 THE WITNESS: I think I shared the  
7 complaint with my mom through e-mail, Karen  
8 Pelishek.

9 BY MS. MURPHY:

10 Q Anything else?

11 A No.

12 Q When did you hire your attorney in relation to  
13 the allegations you're asserting in this  
14 litigation?

15 MS. DeMASTER: Objection. Objection.  
16 This is privileged as far as when he  
17 retained --

18 BY MS. MURPHY:

19 Q I'm not asking you about anything you said to  
20 her. I'm asking you when you hired her.

21 A November of 2022.

22 Q Did you know Amanda Salazar before she was  
23 elected as an alderperson?

24 A Yes.

25 Q And how did you know her?

1 MS. MURPHY: Yep.

2 MS. DeMASTER: He doesn't have this,  
3 and he doesn't remember every single word he  
4 said to Attorney Hall.

5 BY MS. MURPHY:

6 Q You tape recorded your witness interview with  
7 Jill Hall, didn't you?

8 A Yes.

9 Q And you did so without her knowledge, didn't  
10 you?

11 A Yes.

12 Q In fact, she asked you if you were recording  
13 that interview, and you told her that you were  
14 not recording it, didn't you?

15 A I don't know.

16 Q Would you like to hear the tape to refresh your  
17 recollection, or do you recall telling her that  
18 you were not recording it? You can answer the  
19 question.

20 A I may have said that.

21 Q Did anyone tell you to record your interview  
22 with Attorney Hall?

23 A No.

24 Q So you just decided on your own to record your  
25 interview with Attorney Hall?

1 MS. DeMASTER: I'm just going to go  
2 ahead and reiterate another objection. If any  
3 of these questions are going to call for  
4 attorney-client -- my client's already answered  
5 the question, and we're trying to answer right  
6 now and object.

7 MS. MURPHY: What's your objection?

8 MS. DeMASTER: I'm saying I'm going  
9 to go ahead and reiterate the fact that I have  
10 told my client to not answer anything that  
11 might ask for anything attorney-client  
12 privilege, work product, communications,  
13 anything like that. So he's going to answer  
14 questions outside of that.

15 MS. MURPHY: So you're objecting to  
16 my question about whether or not --

17 MS. DeMASTER: Not a specific  
18 question. I am objecting on general grounds.

19 MS. MURPHY: Well, I need you to  
20 object to a specific question. I don't need  
21 general grounds for an objection.

22 MS. DeMASTER: I'm objecting on  
23 general grounds.

24 MS. MURPHY: So you don't have an  
25 objection to this specific question?

1 MS. DeMASTER: That objection  
2 includes that specific question and other  
3 specific questions.

4 MS. MURPHY: So you are objecting  
5 based on attorney-client privilege to whether  
6 or not anyone told him to record the interview?

7 MS. DeMASTER: I am reiterating a  
8 past general objection that will go to any  
9 question that might ask that.

10 BY MS. MURPHY:

11 Q What device did you use to record your  
12 interview with Attorney Hall?

13 A Cell phone.

14 Q Did you plan to record it when it started, or  
15 did you decide during the interview to go ahead  
16 and hit "record"?

17 A At the beginning.

18 Q So I'm going to introduce -- and I've got  
19 copies of these audio recordings on a flash  
20 drive that we can mark. This is actually  
21 WOLFMM00007. I believe it is also PELISHEK004,  
22 but I didn't get that till last night, so I'm  
23 sorry about that.

24 MS. DeMASTER: Let me just object  
25 because he might not know every number, and I

1 don't believe that's accurate. You said this  
2 is Wolf's? What did you say about Wolf?

3 MS. MURPHY: The Pelishek recording  
4 of his interview with Attorney Hall was  
5 provided in Wolf.

6 MS. DeMASTER: Okay. Just asking for  
7 clarification.

8 MS. MURPHY: So for purposes of  
9 identifying the document it is WOLFMM00007.

10 MS. DeMASTER: I see.

11 MS. MURPHY: Which is also -- the  
12 same recording was produced that I got late  
13 yesterday, PELISHEK004.

14 MS. DeMASTER: I see. Thank you for  
15 clarifying.

16 MS. MURPHY: You are welcome, and I'm  
17 going to play timestamp 8:19 to 8:22 into the  
18 record.

19 (Discussion off the record.)

20 (Exhibit No. 3 was marked.)

21 MS. MURPHY: It's actually starting  
22 at 8:12. I can't get it any closer than that.

23 MS. DeMASTER: That's fine.

24 (Audio recording was played.)

25 BY MS. MURPHY:

1 Q So does that refresh your recollection that you  
2 told Attorney Hall that you were not recording  
3 this interview?

4 A Yes.

5 Q And you did that eight minutes into your  
6 interview with her, correct?

7 A Yes.

8 Q And the interview went for an hour and 50-plus  
9 minutes. If that's what the audio recording  
10 shows, would you have any reason to dispute  
11 that?

12 A No.

13 Q Did you tell Jill Hall that Emily asked you  
14 what was being stated and you said "There is  
15 people saying that they don't want,"  
16 quote/unquote, "N-I-G-E-R" -- misspelled --  
17 "and I'm not going to say the word because I've  
18 been chastised for it -- living in their  
19 neighborhoods"?

20 MS. DeMASTER: Objection as to form;  
21 foundation.

22 BY MS. MURPHY:

23 Q Do you recall making that statement?

24 A Yes.

25 Q And isn't it true that Attorney Hall asked you



1 break.

2 (Brief recess taken.)

3 MS. MURPHY: We are back on the  
4 record.

5 BY MS. MURPHY:

6 Q I want to talk about the October 5th, 2022,  
7 lunch with Jamie Haack and Ale Guevara. Who  
8 was involved in getting a meeting scheduled  
9 with Jamie and Ale on October 5th of 2022?

10 A Abby Block.

11 Q You and Todd were not involved in that?

12 A Well, we talked about getting together with  
13 them after we had a previous meeting with  
14 Kristin Stearns.

15 Q And so you first tried to meet with Kristin  
16 Stearns, and why were you trying to meet with  
17 Kristin Stearns?

18 A Because somebody suggested that maybe the  
19 Lakeshore Community Health organization could  
20 help do some training of city employees.

21 Q So did Lakeshore Community Health Care provide  
22 community outreach services?

23 A Yes.

24 Q And did you ask -- and is Kristin Stearns --  
25 what's her position with Lakeshore Community

1 Health Care?

2 A President.

3 Q Did you ask her if Lakeshore Community Health  
4 Care would be willing to partner with the City?

5 A Yes.

6 Q And was that to provide training to both your  
7 staff and neighborhood associations regarding  
8 DEI, racial issues, that type of thing?

9 A Yes.

10 Q Okay. And when did you start investigating  
11 that with Kristin Stearns?

12 A I don't know the exact day.

13 Q It was after the racial slur incident, though,  
14 right?

15 A I believe so, yes.

16 Q So after that time the city administrator began  
17 looking for resources for both your department  
18 and, you know, that could help you with the  
19 neighborhood associations; is that right?

20 A Yes.

21 Q And why didn't you move forward with Lakeshore  
22 Community Health Care?

23 A Because she told us she needed to get her house  
24 in order before she could do community  
25 outreach.

1 Q So they couldn't help you with the services  
2 that you were seeking, right?

3 A Yes.

4 Q And did Kristin then refer you to Jamie?

5 A Yes.

6 Q And was Kristin Stearns part of the Sheboygan  
7 DEIB group?

8 A Yes.

9 Q Okay. How did -- did Kristin facilitate an  
10 introduction to Jamie Haack for you?

11 A Yes.

12 Q Did you know Jamie Haack before you met with  
13 her on October 5th of 2022?

14 A Yes.

15 Q How did you know her?

16 A From the John Michael Kohler Arts Center.

17 Q Is that where she works?

18 A Yes.

19 Q Okay. Who contacted Jamie Haack to try to  
20 schedule a meeting with her?

21 A Abby Block.

22 Q And did Abby do that at your direction?

23 A I believe at mine and Todd's.

24 Q Because you're Abby's immediate boss, right?

25 A Yes.

1 Q And was that contact by phone or by e-mail?

2 A I don't know.

3 (Exhibit No. 10 was marked.)

4 BY MS. MURPHY:

5 Q I'm handing you Deposition Exhibit 10. Take a  
6 moment to review it and let me know when you're  
7 done.

8 A Okay.

9 Q So is this the e-mail correspondence where  
10 Kristin Stearns facilitates an introduction  
11 between you, Todd, Abby, and Jamie Haack?

12 A On September 13th?

13 Q And then Todd responds that he's looking  
14 forward to meeting Jamie and outlining some of  
15 the needs that the City has; is that right?

16 A Yes.

17 Q And Jamie indicates that she's -- on behalf of  
18 the SDEIB initiative she's happy to coordinate  
19 a time for all of you to meet and update one  
20 another on approaches for community equity work  
21 in Sheboygan; is that right?

22 A Yes.

23 Q Okay. When the meeting was finalized, the  
24 meeting date, Jamie told you that Ale would be  
25 attending the meeting with her, didn't she?

1 A I don't believe so.

2 (Exhibit No. 11 was marked.)

3 BY MS. MURPHY:

4 Q You're being handed Deposition Exhibit 11.

5 Take a moment to look at it and let me know  
6 when you've reviewed it.

7 A Okay.

8 Q Okay. So on Page 2 of Exhibit 11 Jamie Haack  
9 sends an e-mail on September 28th at 3:54 p.m.;  
10 is that correct?

11 A Yes.

12 Q And it's to Abby, and it copies you and Todd  
13 and Ale Guevara; is that right?

14 A Yes.

15 Q And in that she says in the first line "It  
16 would be great for myself and Ale Guevara to  
17 meet with you on 10/5 at noon"; is that  
18 correct?

19 A Yes.

20 Q So you did -- were aware that Ale Guevara was  
21 going to be at that October 5th lunch before  
22 you arrived, correct?

23 A I guess so. I didn't recall this e-mail.

24 Q Who attended the lunch on behalf of the City on  
25 October 5th?

1 A Myself, Todd Wolf, and Abby Block.

2 Q And why did the three of you want to meet with  
3 them?

4 A Because we were looking for resources to help  
5 educate city staff on neighborhoods.

6 Q Were you interested in doing some community  
7 outreach around race and ethnicity and  
8 diversity?

9 A Yes.

10 Q What happened during the meeting on  
11 October 5th?

12 A There was discussion about some of the concerns  
13 and things that were going on at the City, and  
14 then there was discussion about if there were  
15 any resources with the group, and basically  
16 they stated that they were looking for funding  
17 in order to move their initiatives forward,  
18 that they were a separate group broken off from  
19 the original DEI Collective.

20 Q Jamie and Ale did not demand \$70,000 from  
21 Mr. Wolf at that meeting, did they?

22 MS. DeMASTER: Objection as to  
23 foundation.

24 BY MS. MURPHY:

25 Q You were at the meeting, right?

1 Hall was that "If the City doesn't embrace  
2 this, you know, these groups are going to come  
3 out and, you know, oppose the City if they  
4 don't support any of it," and "When you said  
5 the City doesn't embrace this, do you mean the  
6 fact that there needs to be budgeting for these  
7 efforts," and you said "Yes," and that "There's  
8 limited dollars in the budget and that it's  
9 Todd's fault because he puts the budget  
10 together and he didn't put the money in there  
11 for it"?

12 MS. DeMASTER: I'm going to object.  
13 This has been asked and answered. Once again,  
14 this is badgering of him. You subjectively  
15 believe something. We have heard the  
16 recording. He's answered this. It's been  
17 asked and answered.

18 BY MS. MURPHY:

19 Q You would acknowledge that the recording is a  
20 true and accurate copy -- or a true and  
21 accurate recording of what you said during your  
22 interview with Jill Hall?

23 A Yes.

24 Q Since you recorded it?

25 A Yes.

1 Q And you didn't alter it at any time after you  
2 made the recording, correct?

3 A Correct.

4 Q Okay. Do you know whether the Sheboygan DEIB  
5 group is different from the Sheboygan  
6 Collective?

7 A I believe so.

8 Q Okay. Do you know whether Todd put money in  
9 the budget for all-staff training?

10 MS. DeMASTER: Objection as to  
11 foundation; form.

12 THE WITNESS: I don't believe so.

13 BY MS. MURPHY:

14 Q You don't believe he put money in the budget  
15 for all-staff training?

16 A I don't know if he put money in the budget.

17 Q Well, training was provided to all staff when  
18 Todd was city administrator for annual  
19 discrimination and harassment, training with  
20 Alonzo Kelly for microaggression, correct?

21 A Yes.

22 Q And there was additional training on mental --  
23 I think it was emotional intelligence and other  
24 training provided to management, correct?

25 A Yes.



1 MS. DeMASTER: Objection; asked and  
2 answered.

3 MS. MURPHY: You can answer.

4 THE WITNESS: The Mayor.

5 BY MS. MURPHY:

6 Q Did both you and Todd engage in discussions  
7 with Kristin Stearns and Jamie Haack and Ale  
8 Guevara trying to look into the issue -- the  
9 neighborhood association issue and ways to  
10 assist them?

11 A Yes.

12 Q And you did that in your official capacity in  
13 your city employment, correct?

14 A Yes.

15 Q The next thing you allege in your answer to  
16 Interrogatory No. 4 in relation to the -- what  
17 the City of Sheboygan did is that they  
18 "condoned the harassment and false  
19 allegations/public outcry of racism while  
20 refusing to publish any correction to the  
21 narratives and facilitating/financing a public  
22 investigation only to protect" -- you say  
23 "Rendall." You're referring to Emily  
24 Rendall-Araujo, though, correct?

25 A Yes.

1 Q Okay. Do you recall receiving an e-mail that  
2 Todd Wolf sent to all city users on  
3 September 23 of 2022 where he informed all city  
4 users that you were asked to describe the  
5 situation occurring in the community and you  
6 said a racial slur matching what was used in  
7 the actual incident? Do you recall him saying  
8 that in an e-mail?

9 A I recall that dialogue, but I don't know the  
10 actual date of the e-mail.

11 Q Okay. So if that's what the e-mail says, you  
12 wouldn't dispute it, that he shared that  
13 information with all city users?

14 A Correct.

15 Q Okay.

16 MS. DeMASTER: Are you referring to  
17 Exhibit 15?

18 MS. MURPHY: Nope, I'm not. I'm  
19 referring to an e-mail on September 23 of 2022.

20 BY MS. MURPHY:

21 Q So what do you contend the City should have  
22 done that they didn't do in relation to the  
23 allegations in the article?

24 A They should have released a statement that I  
25 wasn't a racist.

- 1 Q The article doesn't call you a racist, does it?
- 2 A No, but the public perception was.
- 3 Q What investigation are you referring to when
- 4 you claim that the City financed and
- 5 facilitated an investigation only to protect
- 6 Ms. Rendall-Araujo?
- 7 A Can you provide where that is?
- 8 Q It's at Page 17 of your answer to City
- 9 Interrogatory No. 4.
- 10 A Jill Hall's investigation.
- 11 Q Okay. In relation to the -- the false
- 12 narrative that you say was occurring in the
- 13 media, didn't you really just want the articles
- 14 to stop and the -- the focus on it to stop?
- 15 A Yes.
- 16 Q So if the City had released a press release,
- 17 wouldn't that have just drawn more attention to
- 18 the situation?
- 19 A I can't answer that. I don't know. It may
- 20 have; it may not have.
- 21 Q Okay. So in relation to Jill Hall's
- 22 investigation, do you have any evidence, other
- 23 than speculation, to support that the City
- 24 financed a sham -- a -- a sham investigation
- 25 only to protect Ms. Rendall-Araujo?